

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A TROUT  
POINT LODGE LTD OF NOVA SCOTIA  
& IN THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, TORSTAR  
CORPORATION, NATIONAL  
GEOGRAPHIC SOCIETY, XYZ  
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

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**MOTION FOR ADDITIONAL TIME TO FILE REBUTTAL MEMORANDUM**

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COME NOW Defendants **Vaughn Perret** and **Charles Leary**, by and through their counsel, Purvis & Co. PLLC, and ask the Court to grant them five additional days' time in which to file a rebuttal to the Memorandum of Law in Opposition to Vaughn Perret and Charles Leary's Motion to Dismiss, showing unto the Court the following:

Defendants Perrett and Leary filed their motion to dismiss (#75) and memorandum in support (#76) on September 30, 2016. Plaintiff filed a memorandum in opposition (#77) on October 17, 2016. A rebuttal is currently due not later than October 27, 2016.

Despite diligent effort and in view of counsel's other concurrent commitments, undersigned counsel has insufficient time within which to complete preparation and filing of the aforementioned rebuttal by the current deadline.

No party will be prejudiced by the granting of the requested relief, which is not sought for delay or improper purpose but so that justice may be accorded the parties.

In view of the foregoing and in the interests of justice, the Court should grant five days' additional time for Defendants Perret and Leary to file their rebuttal to the Plaintiff's memorandum in opposition to their motion to dismiss the 2nd Amended Complaint.

RESPECTFULLY SUBMITTED, this the 26th day of October, 2016.

VAUGHN PERRET, DEFENDANT  
and  
CHARLES LEARY, DEFENDANT

BY: PURVIS & CO. PLLC

BY: /s/ Jason B. Purvis  
Jason B. Purvis, MSB # 100873

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that, on October 26, 2016, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]

/s/ Jason B. Purvis